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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JET STAR ENTERPRISES LTD.,

Plaintiff,

v.

05 Civ. 6585 (HB)

GEORGE SOROS, PERNENDU CHATTERJEE,  
DEUTSCHE BANK TRUST COMPANY  
AMERICAS, WELLS FARGO BANK  
NORTHWEST, N.A., AKIN GUMP STRAUSS  
HAUER & FELD LLP, BINGHAM McCUTCHEN  
LLP, SIDLEY AUSTIN BROWN & WOOD LLP,  
and MB STATUTORY TRUST,

**NOTICE OF MOTION**

**Filed Electronically**

Defendants.

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**PLEASE TAKE NOTICE** that, upon the Amended Complaint herein, the accompanying Rule 56.1 Statement of Defendants George Soros and Purnendu Chatterjee, the accompanying memorandum of law, the accompanying Declaration of George Soros, dated May 28, 2006, the accompanying Affidavits of James Walsh, Purnendu Chatterjee, and Raymond Fitzgerald, Nancy M. Dahl, and David Bell, sworn to on May 30, 2006, the exhibits thereto, as well as the Rule 56.1 Statement of Deutsche Bank Trust Company Americas ("Deutsche Bank"), dated May 30, 2006, the memorandum of law submitted by Deutsche Bank, and all prior pleadings and proceedings herein, Defendants George Soros and Purnendu Chatterjee will move this Court, before the Honorable Harold Baer, Jr., United States District Judge, in Courtroom 23B

at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on June 30, 2006, or as soon thereafter as counsel may be heard, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment dismissing the claims in the Amended Complaint asserted against them on the grounds that there is no genuine issue as to any material fact and that Defendants George Soros and Purnendu Chatterjee are entitled to judgment as a matter of law, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to stipulation among counsel, answering papers, if any, are due on or before June 19, 2006.

Dated: New York, New York  
May 30, 2006

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& McCARTHY  
A Professional Corporation

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TO: Violet Elizabeth Grayson, Esq.  
Attorney at Law  
270 Ninth Avenue  
San Francisco, CA 94118  
(212) 386-3367  
Attorney for Plaintiff Jet Star Enterprises, Ltd.

STATE OF NEW YORK

ss.:

COUNTY OF NEW YORK

RAYMOND Q. SPERLING, being duly sworn, deposes and says: that deponent is not a party to the action, is over 18 years of age and resides at 350 Fifth Avenue, Suite 6215, New York, New York 10118. That on the 30<sup>th</sup> day of May, 2006 deponent served the within NOTICE OF MOTION upon:

Violet Elizabeth Grayson, Esq.  
Attorney at Law  
270 Ninth Avenue  
San Francisco, California 94118

[shroux1@aol.com](mailto:shroux1@aol.com)

Attorney for Plaintiff Jet Star Enterprises Ltd.

via E-mail, Federal Express overnight delivery and by depositing a true copy of same enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State;

and that deponent served the within NOTICE OF MOTION by e-mail on May 30, 2006 and by Federal Express, overnight delivery, on May 31, 2006 upon:

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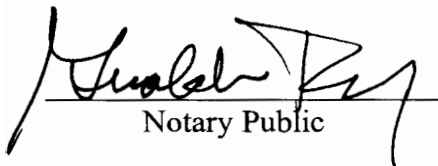
[jkaresh@vedderprice.com](mailto:jkaresh@vedderprice.com)

Attorneys for Defendant Wells Fargo  
Bank Northwest, N.A.

  
RAYMOND Q. SPERLING

Sworn to before me this

31<sup>st</sup> day of May, 2006

  
Notary Public

GERALDINE PERRY  
Notary Public, State of New York  
No 01PE487-9187  
Qualified in ~~N.Y.~~ County *Queens*  
Commission Expires Dec. 1, ~~10~~ *2006*